



## INFORMATION BULLETIN

**Revised:** *March 1, 2000* (changes are in bold italic)  
**Original Date Issued:** March 31, 1998

### SUBJECT: **MANDATED PIPELINE ASSESSMENT**

Section 51012.4 of the California Government Code<sup>1</sup> requires that each pipeline operator file an inspection, maintenance, improvement or replacement assessment with the State Fire Marshal for each type of pipeline listed below. These assessments must be filed before July 1, 2000.

1. Any pipeline or segment of a line built prior to January 1, 1960
2. Any pipeline or portion of line installed on or after January 1, 1960 which are subject to the following conditions:
  - a. Pipelines for which regular internal inspection (smart pigging) cannot be conducted; or,
  - b. Pipelines that experience diminished integrity due to corrosion or inadequate cathodic protection.

***Clarification: For purposes of this assessment, for a pipeline or line segment to be considered smart piggable; it must be able to accommodate a commercially available internal inspection device. It does not have to have permanent launcher and receiver traps, but must have ability to install temporary traps.***

The purpose of the assessment is to assure that the operator provides a means of risk management for each pipeline or pipeline segment. While not a comprehensive list, this State law also identifies the following conditions which must be considered in the evaluation of pipelines that are subject to this assessment.

1. Pipelines in high-density areas
2. Pipelines having a high leak history
3. Pipelines located near seismic fault lines
4. Pipeline within identified ground formation

Assessments submitted by pipeline operators may include additional conditions or evaluation criteria or parameters.

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<sup>1</sup> AB 349 (Escutia) was signed by Governor Pete Wilson on September 27, 1996 and codified as Section 51012.4 of the California Government Code. The guidelines found in this Information Bulletin are based on recommendations from the SFM Pipeline Safety Advisory Committee and AB 349 Assessment Criteria Subcommittee.

The following guidelines should be used preparing the assessment documents.

1. Each assessment criterion should be identified separately and include a detailed narrative section that describes the design features or operations/maintenance/emergency response procedures relating to the criterion.
2. ***The following data should be provided by using the Compact Disk program accompanying this letter:***
  - ' Name and mailing address of the pipeline operator
  - ' Contact name and address for operator representative who can respond to questions from the State Fire Marshal relating to the assessment
  - ' Name of the specific pipeline (e.g., Line LS-43, Carson Trunk Line, etc.)
  - ' CSFM Pipeline Identification Number (8 digits)
  - ' Date of Pipeline Installation (including dates of replacement/construction after original installation)
  - ' Primary commodity transported through the pipeline
  - ' Length of pipeline in miles (NOTE: If assessment is for a portion of a pipeline, list the total length of the pipeline *and* the length of the specific pipeline segment)
3. The assessment package must include a map of the pipeline route including notation of all valve boxes, pump stations, or other similar facilities.
4. In lieu of submitting large or voluminous ancillary or reference documents (e.g., O&M manual, company's written risk management program, etc.), the operator may summarize the data and identify the source document. However, should the State Fire Marshal request this additional data during the review process, these separate documents must be provided by the operator.
5. POPULATION DENSITY: The operator should consider the following:
  - ' Urban vs rural (as defined in 49 CFR 195)
  - ' Types of public awareness programs
  - ' Construction and excavation activities (likelihood of third-party damage, contractors seminars, etc.)
6. HIGH LEAK HISTORY: The operator should consider the following:
  - ' High-Risk pipelines (as defined in Sec. 51013.5, California Government Code)

7. ACTIVE FAULT LINES OR AREAS OF KNOWN SEISMIC ACTIVITY: The operator should consider the following:
  - ' Welding issues (e.g., presence of oxyacetylene welds, etc.)
  - ' Operating procedures/parameters
  - ' Response procedures
  - ' Monitoring capabilities
8. GROUND FORMATIONS: The operator should consider where ground movement could affect structural integrity of the pipeline. Examples of areas that could be subject to these ground movements are:
  - ' Slide areas
  - ' Flood zones
  - ' Subsidence
9. The assessment should include a section on regulatory requirements or existing public policies that could act as barriers to the inspection, maintenance, improvement, or replacement of pipelines. We recommend that this include specific and detailed data and examples including
  - ' conflicting laws, regulations or ordinances;
  - ' special/unusual requirements included in the franchise or right-of-way agreement;
  - ' EIR and/or permits (including conflicting jurisdictional requirements);
  - ' cost of EIR, permits, local agency requirements, or special studies
  - ' impact of construction delays that increase the overall cost of the project or interfere with pipeline operations;
  - ' overall impact of these barriers on the company (operational, economic, legal, media/public relations, etc.).
10. ***Questions regarding the CD data submission and mapping requirements may be directed to Mike Byrnes by telephoning 916/445-8363. All other questions may be directed to Bob Gorham by telephoning 562/497-9100.***
11. Assessment documents must be submitted to the State Fire Marshal by mail at the following address:  
  
***CDF/State Fire Marshal  
Hazardous Material Division  
3950 Paramount Blvd. Suite 210  
Lakewood, CA 90712***

#### **TEXT OF SECTION 51012.4, California Government Code**

- (a) Notwithstanding any other provision of this chapter, including, but not limited to, Section 51012.3, each pipeline operator shall file with the State Fire Marshal, on or before July 1, 2000, an inspection, maintenance, improvement, or replacement assessment for the following:
  - (1) Any pipeline or pipeline segment installed on or after January 1, 1960.
  - (2) Any pipeline installed on or after January 1, 1960, for which regular internal inspections cannot be conducted, or which shows diminished integrity due to corrosion or inadequate cathodic protection.
- (b) When preparing any assessment required by subdivision (a), the operator shall give priority to older pipelines located in densely populated areas, pipelines with a high-leak history, pipelines located near existing seismic fault lines, or, pipelines in areas with identified ground formations.
- (c) On or before January 1, 1998, the State Fire Marshal, in consultation with the Pipeline Safety Advisory Committee and pipeline operators, shall establish evaluation criteria for use by a pipeline operator when conducting any assessment required by subdivision (a).
- (d) A pipeline inspection, maintenance, improvement, or replacement assessment developed pursuant to this section may incorporate any information on regulatory requirements or existing public policies that could act as barriers to the inspection, maintenance, improvement, or replacement of pipelines, including, but not limited to, findings from the studies required pursuant to Section 51015.05.
- (e) Nothing in this section is intended to require the replacement of a pipeline.

#### **Members of the AB 349 Assessment Criteria Subcommittee**

Bob Donnelly, Manager, Environmental & Technical Services, Shell Pipeline  
Jane Dunlap (public member)  
Bob Gorham, Supervising Engineer, SFM Pipeline Safety Program  
Deborah Neev, Vice President, Earth Technology (public member)  
Matt Rezvani, Manager, External Affairs, ARCO (subcommittee chair)  
Jerry Engelhardt, Director, Regulatory Affairs, Santa Fe Pacific Pipelines